

RICHARD M. FOSTER (SBN 93909)  
richard@rmflaw.com

**LAW OFFICES OF RICHARD M. FOSTER**

5429 Cahuenga Boulevard  
North Hollywood, CA 91601  
Telephone: (818) 508-1500  
Facsimile: (818) 508-1529

Attorneys for Plaintiff  
NUNE SHAKHRAMANYAN

PHILLIP A. TALBERT  
United States Attorney

JOSEPH B. FRUEH  
Assistant United States Attorney  
501 I Street, Suite 10-100  
Sacramento, CA 95814

E-mail: joseph.frueh@usdoj.gov  
Telephone: (916) 554-2702  
Facsimile: (916) 554-2900

Attorneys for Defendant  
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

NUNE SHAKHRAMANYAN,

Plaintiff,

v.

UNITED STATES,

Defendant.

No. 1:23-cv-01010-MCE-AC

**STIPULATION AND PROPOSED ORDER  
FOR RULE 35 PHYSICAL EXAMINATION**

1 IT IS HEREBY STIPULATED, by and between the parties through their undersigned counsel,  
2 as follows:

3 1. Plaintiff Nune Shakhramanyan will undergo a physical examination conducted by  
4 Dr. Michael Hembd, M.D., at 2600 W. Olive Avenue 5th Floor, Suite 500, Burbank, CA 91505. The  
5 examination will occur on October 4, 2024, at 11:00 a.m. The examination will take approximately one  
6 to two hours to complete.

7 2. Dr. Hembd will conduct a standard musculoskeletal examination to assess the injuries  
8 that Plaintiff attributes to the accident that occurred on June 29, 2020, to include her head, neck, chest  
9 and abdomen, cervical and thoracic spine, parietal bone, basilar skull, shoulder, clavicle, hand, and  
10 wrist. and spine. The examination will include a detailed medical history.

11 3. Plaintiff shall answer relevant and appropriate inquiries made by Dr. Hembd so that he  
12 can medically evaluate the nature, extent, and cause of Plaintiff's condition as well as her prognosis.  
13 Dr. Hembd's inquiries shall be reasonably calculated to elicit information about the nature, extent,  
14 cause, and prognosis of Plaintiff's injuries.

15 4. Plaintiff will not be required to perform movements or exercises that cause her pain.  
16 Plaintiff shall inform Dr. Hembd and stop any movements or exercises that cause her pain.

17 5. Two American Sign Language ("ASL") interpreters provided by Cal Interpreting &  
18 Translations shall be present during the examination to facilitate communication between Plaintiff and  
19 Dr. Hembd.

20 6. Other than Dr. Hembd, Plaintiff, Plaintiff's sister Narine Shakhramanyan, and the ASL  
21 interpreters, no other observers will be permitted in the examination. No audiovisual recording of the  
22 examination will be permitted.

23 7. Dr. Hembd shall receive a copy of this executed Stipulation.

24 8. Defendant shall provide Plaintiff's counsel with a report of the examination consistent  
25 with Federal Rules of Civil Procedure 35(b) and 26(a)(2) and the Court's Scheduling Order.

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9. The cost of the examination and ASL interpreters shall be borne by the Defendant.

Dated: LAW OFFICES OF RICHARD M. FOSTER

By: RICHARD M. FOSTER

Attorneys for Plaintiff  
NUNE SHAKHRAMANYAN

PHILLIP A. TALBERT  
United States Attorney

By: \_\_\_\_\_  
JOSEPH B. FRUEH  
Assistant United States Attorney

Attorneys for Defendant  
UNITED STATES OF AMERICA

**IT IS SO ORDERED**

Dated: September 18, 2024

Allison Claire  
ALLISON CLAIRE  
UNITED STATES MAGISTRATE JUDGE